

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, ET AL.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, ET AL.,

Defendants.

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' RESPONSES TO
DEFENDANT BRAD RAFFENSPERGER'S FIRST REQUESTS FOR
ADMISSION**

In accordance with Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Donna Curling, Donna Price and Jeffrey Schoenberg (collectively, the "Curling Plaintiffs"), by and through counsel, hereby respond and object to Defendant Brad Raffensperger's First Requests for Admission to Curling Plaintiffs ("Interrogatories"), served on December 28, 2020.

PRELIMINARY STATEMENT

Curling Plaintiffs decline to do more than is required by the Federal Rules of Civil Procedure, Federal Rules of Evidence, or the applicable rules and orders of this Court.

Nothing in these responses is an admission by Curling Plaintiffs of the

ongoing and because fact discovery is ongoing, Curling Plaintiffs presently lack sufficient information or knowledge to admit or deny this Request.

REQUEST FOR ADMISSION NO.19:

Admit that you are not contesting the outcome of the Presidential Election held in Georgia on November 3, 2020.

RESPONSE:

Curling Plaintiffs object to the phrase “contesting” in the context of this request as vague and ambiguous. Curling Plaintiffs further object to this Request as premature both to the extent it seeks Curling Plaintiffs’ contentions and to the extent it seeks information that may be the subject of expert discovery and further fact discovery. Curling Plaintiffs have long sought discovery from Defendants regarding the security and reliability of the Election System but Defendants have not been forthcoming with the requested discovery. Curling Plaintiffs also object to this request as irrelevant insofar as they have not brought a claim in this case to overturn the outcome of the Presidential Election held in Georgia on November 3, 2020. Without waiving their objections, Curling Plaintiffs admit that they have not filed a contest to overturn the outcome of the Presidential Election held in Georgia on November 3, 2020.

REQUEST FOR ADMISSION NO. 20:

Admit that you are not contesting the outcome of any of the other elections held in Georgia on November 3, 2020.

RESPONSE:

Curling Plaintiffs object to the phrase “contesting” and “other elections” in the context of this request as vague and ambiguous. Curling Plaintiffs further object to this Request as premature both to the extent it seeks Curling Plaintiffs’ contentions and to the extent it seeks information that may be the subject of expert discovery and further fact discovery. Curling Plaintiffs have long sought discovery from Defendants regarding the security and reliability of the Election System but Defendants have not been forthcoming with the requested discovery. Curling Plaintiffs also object to this request as irrelevant insofar as they have not brought a claim in this case to overturn the outcome of the Presidential Election held in Georgia on November 3, 2020. Without waiving their objections, Curling Plaintiffs admit that they have not filed a contest to overturn the outcome of any of the elections held in Georgia on November 3, 2020.

REQUEST FOR ADMISSION NO. 21:

Admit that you have no evidence that there was any mismatch between the QR Codes on the Paper Ballots cast in the Presidential Election held on in [sic]

as vague and ambiguous. Curling Plaintiffs further object to this Request as premature both to the extent it seeks Curling Plaintiffs' contentions and to the extent it seeks information that will be the subject of expert discovery and further fact discovery. Curling Plaintiffs have long sought discovery from Defendants regarding the subject of this request but Defendants have not been forthcoming with the requested discovery. Because Curling Plaintiffs' investigation, including expert analyses, of the information available to them is ongoing and because fact discovery is ongoing, Curling Plaintiffs presently lack sufficient information or knowledge to admit or deny this Request.

Dated: January 14, 2021

Respectfully,

/s/ David D. Cross

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